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ATTORNEYS FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

In re: Earthsnap, Inc.	§	Case No. 24-60363
	§	
<i>Debtor</i>	§	Chapter 11, Subchapter V
	§	
	§	(Jointly Administered)

In re: Eric Ralls	§	Case No. 24-60504
	§	
<i>Debtor</i>	§	Chapter 11, Subchapter V
	§	

**DESIGNATION OF RECORD ON APPEAL AND
IDENTIFICATION OF ISSUES PRESENTED**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Earthsnap, Inc. (“Earthsnap”) and Eric Ralls (“Ralls”) (Earthsnap and Ralls collectively “**Appellants**” or individually an “**Appellant**”), Appellants, and file this their Designation of Record on Appeal and Identification of Issues Presented (the “**Designation**”).

Appellant designates the following documents as part of the record on appeal:

	From Case No. 24-60303 (Earthsnap)	Date Filed	ECF No.
1.	Notice of Appeal and Statement of Election	6/24/2025	198
2.	Order Appealed #1 (Order Denying Motion to Reconsider)	6/10/2025	191
3.	Order Appealed #2 (Order Granting Motion to Convert)	4/21/2025	167

4.	Docket Sheet	N/A	N/A
5.	Original Chapter 11 Petition	6/17/2024	1
6.	Notice of Meeting of Creditors	6/20/2024	3
7.	Original Schedules	7/2/2024	7
8.	Original Statement of Financial Affairs	7/2/2024	9
9.	Amended Chapter 11 Petition	7/22/2024	12
10.	Amended Schedules	7/22/2024	13
11.	Amended Statement of Financial Affairs	7/22/2024	14
12.	Amended creditor matrix	7/23/2024	15
13.	Application to Employe Attorney	7/30/2024	18
14.	Debtor's Subchapter V Consensual Reorganization Report	8/4/2024	20
15.	Debtor's Amended Subchapter V Consensual Reorganization Report	8/5/2024	21
16.	Motion for Joint Administration	8/21/2024	25
17.	Order Dismissing Without Prejudice Motion for Joint Administration	8/23/2024	26
18.	Amended Motion for Joint Administration	8/27/2024	28
19.	Order Approving Employment of Attorney	9/3/2024	31
20.	Motion to Extend Time to File Chapter 11 Subchapter V Plan	9/16/2024	34
21.	Operating Report (07-2024)	10/8/2024	42
22.	Operating Report (06-2024)	10/8/2024	43
23.	Operating Report (08-2024)	10/8/2024	44
24.	Operating Report (09-2024)	10/8/2024	45
25.	Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	10/11/2024	46
26.	Second Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	10/16/2024	49
27.	Order Granting Joint Administration of Bankruptcy Estates	10/17/2024	50
28.	Motion to Continue Hearing (<i>Emergency</i>)	11/19/2024	60
29.	Second Motion to Continue Hearing	11/27/2024	63
30.	Debtor's Subchapter V Consensual Reorganization Report	12/10/2024	66
31.	Operating Report (10-2024)	12/19/2024	67
32.	Operating Report (11-2024)	12/19/2024	68
33.	Order Granting Second Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	12/20/2024	69
34.	Motion to Compel Debtor to Comply with 2004 Discovery Order	12/20/2024	70
35.	Amended Motion to Compel Debtor to Comply with 2004 Discovery Order	12/23/2024	72

36.	Motion to Compel Debtor to Comply with 2004 Discovery Order	12/23/2024	73
37.	Transcript of Hearing Held on 12/19/2024	1/2/2025	74
38.	Chapter 11 Small Business Subchapter V Plan	1/16/2025	75
39.	Order Granting HI Investments, LLC's Motion To Compel Debtor to Comply with October 25, 2024 Order Granting Rule 2004 Discovery	1/17/2025	76
40.	Order Granting Plantsnap Inc.'s Motion To Compel Debtor to Comply with September 17, 2024 Order Granting Rule 2004 Discovery	1/17/2025	77
41.	Application to Employ Jonathan Solsbery, Solsbery CPA, LLC	1/30/2025	86
42.	Request for Expedited Hearing On <i>Discovery Matters</i> Filed by HI Investments, LLC	2/5/2025	87
43.	Order Granting Expedited Hearing Regarding Discovery Matters	2/6/2025	88
44.	Order Dismissing Employment Application of Jonathan Solsbery, Solsbery CPA, LLC as Accountant for the Estate	2/11/2025	93
45.	Order To Show Cause Why Case Should Not Be Dismissed Or Converted For Cause Under § 1112.	2/13/2025	94
46.	Joint Motion to Convert Chapter 11 Case to Chapter 7 Case Without Waiver of 30-Day Hearing Requirement Filed by PlantSnap Inc	2/17/2025	97
47.	Operating Report (12-2024)	2/24/2025	99
48.	Operating Report (01-2025)	2/24/2025	100
49.	Joinder in Support of <i>PlantSnap Inc. and DEJ Partners, LLC's Joint Motion to Convert Chapter 11 Cases</i> Filed by HI Investments, LLC	3/3/2025	101
50.	Joint Objection to Confirmation of Chapter 11 Plan Filed by PlantSnap Inc.	3/4/2025	103
51.	Objection to Confirmation of Chapter 11 Plan Filed by HI Investments, LLC	3/5/2025	104
52.	Objection to Confirmation of Chapter 11 Plan Filed by Amazon Web Services, Inc	3/5/2025	105
53.	Unopposed Request for Emergency Hearing On <i>the March 19, 2025 Hearing</i> Filed by PlantSnap Inc.	3/11/2025	107
54.	Motion to Continue Hearing (<i>Emergency</i>) (<i>Opposed</i>) Filed by EarthSnap, Inc.	3/13/2025	110
55.	Request for Emergency Hearing On <i>Motion for Continuance</i> Filed by EarthSnap, Inc.	3/13/2025	111
56.	Joint Objection Filed by PlantSnap Inc.	3/13/2025	112
57.	Order Denying Emergency Motion for Continuance	3/14/2025	114

58.	Witness & Exhibit List	3/14/2025	115
59.	Witness & Exhibit List	3/14/2025	116
60.	Witness & Exhibit List	3/14/2025	117
61.	Witness & Exhibit List	3/14/2025	118
62.	Supplemental Witness & Exhibit List	3/18/2025	122
63.	Supplemental Witness & Exhibit List	3/18/2025	123
64.	Amended Witness & Exhibit List	3/19/2025	124
65.	Supplemental Witness & Exhibit List	3/21/2025	128
66.	Transcript of Hearing on 3/25/2025 (to be ordered)	3/25/2025	N/A
67.	Application to Employ	3/26/2025	134
68.	Amended Operating Report (2024-06)	3/28/2025	135
69.	Amended Operating Report (2024-07)	3/28/2025	136
70.	Amended Operating Report (2024-08)	3/28/2025	137
71.	Amended Operating Report (2024-09)	3/28/2025	138
72.	Amended Operating Report (2024-10)	3/29/2025	140
73.	Application to Employ Accountant	3/30/2025	141
74.	Amended Operating Report (2024-11)	3/30/2025	142
75.	Amended Operating Report (2024-12)	3/30/2025	143
76.	Amended Operating Report (2025-01)	3/30/2025	144
77.	Amended Operating Report (2025-02)	3/30/2025	145
78.	Amended Schedules	4/1/2025	146
79.	Amended Operating Report (2024-06) (to add signatures only)	4/1/2025	147
80.	Amended Operating Report (2024-07) (to add signatures only)	4/1/2025	148
81.	Amended Operating Report (2024-08) (to add signatures only)	4/1/2025	149
82.	Amended Operating Report (2024-09) (to add signatures only)	4/1/2025	150
83.	Amended Operating Report (2024-10) (to add signatures only)	4/1/2025	151
84.	Amended Operating Report (2024-11) (to add signatures only)	4/1/2025	152
85.	Amended Operating Report (2024-12) (to add signatures only)	4/1/2025	153
86.	Amended Operating Report (2025-01) (to add signatures only)	4/1/2025	154
87.	Amended Operating Report (2025-02) (to add signatures only)	4/1/2025	155
88.	Amended Operating Report (2024-12) (to add non-DIP bank statement)	4/6/2025	156
89.	Amended Operating Report (2025-01) (to add final non-DIP bank statements)	4/6/2025	157

90.	Operating Report (2024-08) (Jointly Administered Debtor Eric Ralls)	4/9/2025	159
91.	Operating Report (2024-09) (Jointly Administered Debtor Eric Ralls)	4/9/2025	160
92.	Operating Report (2024-10) (Jointly Administered Debtor Eric Ralls)	4/9/2025	161
93.	Operating Report (2024-11) (Jointly Administered Debtor Eric Ralls)	4/9/2025	162
94.	Operating Report (2024-12) (Jointly Administered Debtor Eric Ralls)	4/9/2025	163
95.	Operating Report (2025-01) (Jointly Administered Debtor Eric Ralls)	4/9/2025	164
96.	Operating Report (2025-02) (Jointly Administered Debtor Eric Ralls)	4/9/2025	165
97.	Amended Chapter 11 Small Business Subchapter V Plan	4/13/2025	166
98.	Motion to Reconsider	5/5/2025	176
99.	Motion to Withdraw as Attorney	5/12/2025	178
100.	Amended Motion to Withdraw as Attorney	5/14/2025	179
101.	Joint Objection Filed by Plantsnap, Inc.	5/22/2025	180
102.	Amended Statement of Financial Affairs	5/22/2025	181
103.	Operating Report (2025-03)	5/23/2025	183
104.	Amended Schedules	5/23/2025	184
105.	Joinder in Support of <i>PlantSnap Inc. and DEJ Partners, LLC's Joint Opposition to Debtors' Motion for Reconsideration Regarding Order Converting Cases to Chapter 7</i> Filed by HI Investments, LLC	5/27/2025	186
106.	Joinder in Support of <i>Joint Opposition to Debtors' Motion for Reconsideration Regarding Order Converting Cases to Chapter 7</i> Filed by Areya Aurzada	5/27/2025	187
107.	Amended Operating Report (2025-03)	5/28/2025	189
108.	Objection to Motion to Withdraw as Attorney	6/3/2025	190
109.	Order Granting Amended Motion To Withdraw As Attorney	6/10/2025	192
	From Case No. 24-60504 (Eric Ralls)	Date Filed	ECF No.
110.	Notice of Appeal of Order of Conversion entered in Case No. 24-60363 and Order Denying Reconsideration regarding same	7/15/2025	77
111.	Order Appealed #1 (Order Granting Motion to Convert)	4/21/2025	167 (in Case No. 24-60363)
112.	Order Appealed #2 (Order Denying Motion to Reconsider)	7/1/2025	65

113.	Chapter 11 Subchapter V Voluntary Petition	8/18/2024	1
114.	Original Schedules	9/3/2024	11
115.	Original Statement of Financial Affairs	9/3/2024	12
116.	Amended Schedules	9/25/2024	14
117.	Amended Statement of Financial Affairs	9/25/2024	15
118.	Order Granting Joint Administration Of Bankruptcy Estates	10/17/2024	21
119.	Operating Report (2024-09)	12/28/2024	36
120.	Operating Report (2024-10)	12/28/2024	37
121.	Operating Report (2024-11)	12/28/2024	38
121.	Operating Report (2025-01)	3/12/2025	39
122.	Motion to Withdraw as attorney	5/13/2025	47
123.	Amended Motion to Withdraw as attorney	5/14/2025	48
124.	Objection Filed by HI Investments, LLC	6/3/2025	49
125.	Motion to Reconsider <i>Order of Conversion (Copy of Motion filed in Case #: 24-60303 (Dkt. No. 176 therein) on May 5, 2025)</i>	6/3/2025	50
126.	Order granting Amended Motion to Withdraw	6/10/2025	52

Statement of Issues to Be Presented on Appeal

Appellant hereby states that the issues to be presented on appeal are as follows:

1. Whether the trial court erred in converting Appellants' chapter 11 bankruptcy cases to chapter 7;
2. Whether the trial court erred in denying Appellants' Motions for Reconsideration regarding Order Converting Cases to Chapter 7.

DATED this 29th day of July, 2025

Respectfully submitted,

THE MITCHELL LAW FIRM, L.P.

/s/ Gregory W. Mitchell

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Attorney for Debtors/Appellants

CERTIFICATE OF SERVICE

I hereby certify that on **July 29, 2025**, a true and correct copy of the foregoing was served via U.S. Mail and/or via the court's ECF system to all parties receiving notice via the Court's ECF system.

/s/ Gregory W. Mitchell

Gregory W. Mitchell

Attorney for Debtors/Appellants